UNITED STATES OF AMERICA)
)
v.)
)   **STIPULATION OF**
)   **EXPECTED TESTIMONY**
Manning, Bradley E.)
PFC, U.S. Army,)
HHC, U.S. Army Garrison,)   **Ms. Cathryn Strobl**
Joint Base Myer-Henderson Hall)
Fort Myer, Virginia 22211)   16 June 2013

(U) It is hereby agreed by the Accused, Defense Counsel, and Trial Counsel, that if Ms. Cathryn Strobl were present to testify during the merits and pre-sentencing phases of this court-martial, she would testify substantially as follows:

1. (U) I am currently employed as a contractor with the Central Intelligence Agency (CIA). I am a software developer and I worked on the contract for the CIA's World Intelligence Review (WIRe) and its predecessor program from approximately 2005 through 2012. At present, I work as a software developer for another disseminated intelligence program. I hold a Bachelor's degree in Spanish from the University of Mary Washington, a Juris Doctor from the University of North Carolina at Chapel Hill, a Master's of Business Administration from the University of North Carolina at Greensboro, and a Computer Science Certificate from North Carolina State University. I have been working in the information technology field since 1997, when I began working in database administration at University of North Carolina Hospitals. Since that time, I have participated in working in multiple training courses specific to database administration, web development, and system administration, including training geared towards the tools used to develop, administer, and maintain an enterprise application.

2. (U) WIRe is a website controlled by the CIA, and located on the SIPRNET that allows a user, once authenticated, to conduct searches of various files created by the CIA and other organizations. That authentication is performed by means of an Intelink Passport user account. To apply for an Intelink Passport account a user has to enter their personal information on the Intelink site on SIPRNET.

3. (U) In approximately May 2010, I was asked to pull any user information for Bradley Manning as well audit logs for the date range October 2009 to May 2010 from the sending IP addresses of 22.225.41.22 and 22.225.41.40. At that time, an Intelink Passport account was required in order to access all information on the WIRe, except for leadership profiles. Under certain circumstances, if a user clicked on a leadership profile, the user id would not be logged. When the user id was logged, the WIRe system created numerous types of logs. In this case, I pulled all three types of logs: production logs, http logs, and SQL logs. The logs represent the same information, but they do so with different data in different formats. The application logs show requests at the application level. The http logs show all requests going in and out of the web server. The SQL logs show the titles of the documents with their document numbers as reflected in the database. The SQL logs correspond with the http logs in that they show the actual name of the document numbers recorded in the http logs. I pulled these three logs to paint a fuller picture of the activity.

4. (U) I pulled these logs by writing queries and running those queries. I applied SQL queries to the database and UNIX commands to the web and application logs. SQL is a structural query language for interacting with databases. In other words, it is a tool used to perform inquires and pull data from a database. In order to accomplish the SQL query, I went to the command prompt screen, typed in the query, hit enter, and the computer generated the logs. The SQL queries I used pulled the logs and put them into a text output. I then saved the logs as well as the SQL query I used to pull those logs. UNIX in an operating system that comes in several variants, often called "flavors." For purposes of the queries described below, I used the "flavor" Solaris. To execute commands to cull the web and application logs on Solaris, I drafted and typed into a command prompt queries that contained the specific user id, IP addresses, and dates I was asked to review. In response to these queries, Solaris generated logs of user activity. These logs are identified using the original log name plus the suffix ".culled," as see below. In sum, by these queries, I asked the system to pull the pertinent audit events by the user "bradley.e.manning" and/or the IP addresses 22.225.41.22 and 22.225.41.40 and/or the time date group of October 2009 to May 2010.

5. (U) I pulled the HTTP logs, which log all activity going in and out of the web server, by IP address and time and date group. Specifically, I pulled the HTTP logs for the IP addresses 22.225.41.22 and 22.225.41.40 between October 2009 and May 2010. The results are contained in the following files:

ciawire-production.httpd.log.2010-02-20.culled
ciawire-production.httpd.log.2010-02-21.culled
ciawire-production.httpd.log.2010-02-23.culled
ciawire-production.httpd.log.2010-02-24.culled
ciawire-production.httpd.log.2010-02-25.culled
ciawire-production.httpd.log.2010-02-27.culled
ciawire-production.httpd.log.2010-03-01.culled
ciawire-production.httpd.log.2010-03-02.culled
ciawire-production.httpd.log.2010-03-04.culled
ciawire-production.httpd.log.2010-03-08.culled
ciawire-production.httpd.log.2010-03-09.culled
ciawire-production.httpd.log.2010-03-11.culled
ciawire-production.httpd.log.2010-03-12.culled
ciawire-production.httpd.log.2010-03-15.culled
ciawire-production.httpd.log.2010-03-19.culled
ciawire-production.httpd.log.2010-03-20.culled
ciawire-production.httpd.log.2010-03-21.culled
ciawire-production.httpd.log.2010-03-22.culled
ciawire-production.httpd.log.2010-03-23.culled
ciawire-production.httpd.log.2010-03-24.culled
ciawire-production.httpd.log.2010-03-25.culled
ciawire-production.httpd.log.2010-03-27.culled
ciawire-production.httpd.log.2010-03-28.culled
ciawire-production.httpd.log.2010-03-29.culled
ciawire-production.httpd.log.2010-03-30.culled
ciawire-production.httpd.log.2010-04-03.culled
ciawire-production.httpd.log.2010-04-08.culled

ciawire-production.httpd.log.2010-04-27.culled

6. (b) (1) (B)

a. (U) The entry "22.225.41.22" is the sending IP address. This address indicates the IP address of the computer that is requesting the information.

b. (U) The entry "bradley.e.manning" is the user name assigned to the Intelink Passport account that is requesting the information. This Intelink user account is associated with the common name "Manning, Bradley E."

c. (U) The entry "21/Mar/2010:05:39:53 -0400" is the time and date group, which is given in Greenwich Mean Time (GMT). The time and date group records when the computer processes the request from the sending IP address.

d. (b) (1) (B)

e.

f. (U) The entry "%20" means that a space is there.

g. (U) The entry "200" is a code that states that the user's request to "GET" and access the document was successful.

h. (U) Based on the log information, I can tell someone downloaded the .pdf because a document number follows the "GET" request. A document number indicates that the user opened the document. Additionally, if the user has downloaded the document, then the log will say /document/docnum/attachment/pdf name.

i. (U) The entry "45266" indicates the size of the user's request.

j. (b) (1) (B)

3

k. (U) The entry "Mozilla/5.0" tells me that the user of the .22 IP address was using version 5 of the Mozilla browser.

l. (U) The entry "(Windows; U; Windows NT 5.1; en-US; rv:1.9.0.10)" means that a Windows NT workstation was being used by the user of 22.225.41.22 computer.

m. (U) The entry "Gecko/2009042316 Firefox/3.0.10\" tells me that the 22.225.41.22 system was using the Firefox browser.

n.

7. (U) I pulled the production logs, which log all activity going in and out of the application, by IP address. Specifically, I pulled the production logs for the IP addresses 22.225.41.22 and 22.225.41.40 between October 2009 and May 2010. I obtained results from 20 February 2010 to 27 April 2010. The results are contained in the following files:
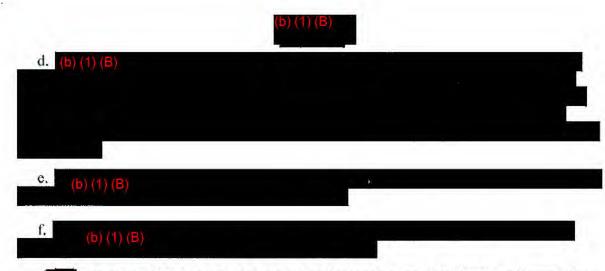
production.log.20100303.culled (various dates between 20-Feb-10 and 2-Mar-10)
production.log.20100401.culled (various dates between 4-Mar-10 and 30-Mar-10)
production.log.20100615.culled (various dates between 3-Apr-10 and 27-Apr-10)

8.

a. (U) The entry "22.225.41.22" is the sending IP address. This address indicates the IP address of the computer that is requesting the information.

b. (U) The entry "2010-03-21 05:39:53" is the time and date group. The time and date group records when the computer processes the request from the sending IP address.

c.

d. (b) (1) (B)

e. (b) (1) (B)

f. (b) (1) (B)

g.(b) The entry "200" is a code that states that the user's request to "GET" and access the document was successful. The "OK" indicates the same information as the 200, that the document with identification number (b) (1) (B) downloaded to the 22.225.41.22 IP address.

h. (b) (1) (B)

i. (U) Based on the log information, I can tell someone downloaded the .pdf because a document number follows the "GET" request. A document number indicates that the user opened the document. Additionally, if the user has downloaded the document, then the log will say /document/docnum/attachment/pdf name.

9. (U) I also conducted database queries to pull other information and to pull information sorted in different ways. Again, I wrote a variety of SQL queries to do this. The results are contained in the following files:

sql_document_views.lst
sql_document_views_documents_earliest.lst
sql_documents.lst
sql_dvs_documents_users.lst
sql_searches.lst
sql_users.lst

10. (U) The query "sql_users.lst" is the result of the SQL command that I wrote to pull the Intelink Passport Account information for the user with the first name "Bradley" and the last name "Manning." The information the query produced revealed that the user with the Passport Identification "bradley.e.manning" had his organization listed as "USA"; his "Employee_Type" as "Military"; and his "Rank" as "E-4." His registered email address was bradley.manning@us.army.smil.mil. His identification number was "31169."

11. (U) To assist in, among other things, determining the names of the product numbers that were viewed and downloaded, I wrote a SQL query to pull the names of the products viewed by

the user with the identification number "31169". I got the identification number from the query I conducted in "sql_users.lst" to limit to search to only pull the documents viewed by the user of the Intelink Passport Account with the user name "bradley.e.manning." I saved that query as "sql_documents.lst." I wrote another SQL command to just limit the query of "31169" to document numbers and times, which is saved as "sql_document_views.lst." I also wrote a SQL command to pull the document names in order of earliest viewed, which I saved as "sql_document_views_documents_earliest.lst". "Sql_dvs_documents_users" has all the views by user "31169" saved in the order the user viewed them.

12. ██████████ (b) (1) (B) ██████████

(b) (1) (B) ██████████

a. ██████ (b) (1) (B) ██████

b. ██ (b) (1) (B) ██████

c. (U) The classification of the title is "C//NF."

d. ██ (b) (1) ██████

e. (U) The classification of the memorandum is "SECRET//NOFORN."

13. (U) The information I provided is computer generated and only limited people have access to the information. I have no reason to believe that the information I provided was not accurate. On 19 June 2012, I attested to the authenticity of the CIA Wire log files, containing the above listed logs and queries. The attestation is BATES numbers: 00449441-00449441. **Prosecution Exhibit ⟨2⟩ for Identification** is the logs.

//ORIGINAL SIGNED//
ANGEL M. OVERGAARD
CPT, JA
Assistant Trial Counsel

//ORIGINAL SIGNED//
THOMAS HURLEY
MAJ, JA
Defense Counsel

//ORIGINAL SIGNED//
BRADLEY E. MANNING
PFC, USA
Accused